

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DONALD B. INGRAM,)
Plaintiff,)
v.) NO. 3:12-cv-01106
STATE OF TENNESSEE DEPARTMENT)
OF LABOR AND WORKFORCE)
DEVELOPMENT, and KARLA DAVIS,)
Individually, and in her capacity as)
Commissioner of the State of Tennessee)
Department of Labor and Workforce)
Development,)
Defendants.)

JOINT MOTION TO AMEND CASE MANAGEMENT ORDER #1

Counsel for Plaintiff and the Defendants hereby jointly move that this Court amend Case Management Order #1 (D.E. 14) by extending the deadline for making Rule 26(a)(1)(A) through (E) disclosures from January 18, 2013 to January 25, 2013. The parties request this extension in order to afford them more time to collect information for these disclosures. This extension will not unduly delay the progress of trial preparation in this case.

Respectfully submitted,

NEAL & HARWELL, PLC

By: /s/ Gerald D. Neenan
Gerald D. Neenan, No. 006710
Kendra E. Samson, No. 018976

One Nashville Place, Suite 2000
150 Fourth Avenue North
Nashville, Tennessee 37219
Telephone: (615) 244-1713
Facsimile: (615) 726-0573
gneenan@nealharwell.com
ksamson@nealharwell.com

Counsel for Plaintiff

WALLER LANSDEN DORTCH & DAVIS, LLP

By: s/ Brian M. Clifford (w/permission)
Andrew S. Naylor, No. 17128
Brian M. Clifford, No. 29778

511 Union Street, Suite 2700
Nashville, TN 37219
Telephone: (615) 244-6380
Facsimile: (615) 244-6804
andy.naylor@wallerlaw.com
brian.clifford@wallerlaw.com

Counsel for Defendants